

# City of Portland Outfall Project

## Conceptual Remedial Investigation and Source Control Evaluation

### DRAFT July '07

A Remedial Investigation (RI) for a given outfall basin will be considered complete when the following have been accomplished.

#### 1) Investigation and Source Control Evaluation

Preliminary work has documented:

- a) The basin characteristics (physical data);
- b) The need for stormwater source control, based on the presence of contaminants of concern that exceed JSCS screening level values or other risk-based criteria for in-water sediment data, inline sediment data, sediment traps, etc., and including stormwater analyses from an outfall (unless determined to be unnecessary for a low priority basin);
- c) Where source control is needed within a basin, based on land use, site-specific data, and site discovery work; and
- d) To what extent source control is needed both in terms of priority (e.g., high, medium, or low priority) and the likely level of effort (e.g., best management practices, site-specific cleanup measures such as soil removal, end-of-pipe treatment, etc.);
  - o Whether contamination at sites is related to historic releases that impacted soil or groundwater (i.e., Cleanup issues), or
  - o Whether contamination at sites is related to ongoing facility operational practices and/or discharges consistent with land use (i.e., WQ/City permit issues) - may characterize "ambient" stormwater discharges through City monitoring, literature values, or via the LWG Round 3a sampling data.

Actions needed to clarify requirements/deliverables:

- Develop firm criteria for item b, including inline sampling requirements, and outfall sampling expectations- should be available via RI workplan for outfall project
- Satisfaction of bullet c should follow from agreements reached in b.
- Criteria for d. need to be developed, either for all basins, or basin by basin

#### 2) Interim Source Control Measures

Those measures that are readily implementable and are likely to reduce contaminants in discharge (e.g., cleanouts and BMPs) have been identified and implemented on a site-specific basis within a basin. Based on feasibility of the application of the BMPs relative to exceedances, currently identified based on JSCS SLVs.

Actions needed to clarify requirements/deliverables:

- For individual sites, finalize site management expectations for stormwater evaluations (Karen and Keith working on)
- For the basin as a whole, evaluate and implement any non-site specific actions that could be taken to control discharges (i.e., line cleanouts and repairs, other actions that reduce or divert discharges)

### **3) RI and Source Control Evaluation Report**

Submitted to DEQ for single basins or multiple basins depending on the complexity - comprehensive documentation of #1 and #2 above. A formal risk assessment is not anticipated. |

Actions needed to clarify requirements/deliverables:

- Identify format for reporting so that provisions of #1 and #2 above are met
- Identify timing of reporting for each Outfall- pre or post PH RIFS?

### **4) Source Control Alternatives Evaluation**

Site-Specific (i.e., by Owners). Alternatives beyond interim measures have been evaluated site-specifically where they are required to manage legacy contamination (e.g., soil removal, capping, stormwater infrastructure improvements, groundwater containment, etc.).

Basin-wide (i.e., by the City). The need for a stormwater remedy for ongoing facility operational practices has been evaluated, e.g.,

- a) Portland Harbor stormwater permit
- b) Cleanup Program stormwater “generic” remedy (BMPs and monitoring), or
- c) End of pipe treatment where site-specific work is unlikely to achieve stormwater goals (should include alternatives similar to those presented in Columbia Slough Watershed Action Plan, Section 4.4)

Actions needed to clarify requirements/deliverables:

- Site Specific: summary of actions taken within a basin, site by site, to achieve SC for stormwater pathway
- Basin-wide: discussion of need for items a-c above, per basin, or multiple basins

### **5) Source Control Decision |**

Could be per basin, or for entire ISA. RI report and SCE report covering one or more basins has been approved by DEQ and a Source Control Decision document prepared for EPA's opportunity to review. A City Outfall Project Record of Decision may be

applicable either basin by basin or for all basins within ISA, once outfall RIs and SCDs have been completed.

Examples:

- High priority basin – Cleanup sites within the basin are ongoing sources but are being addressed through DEQ oversight, the need for a PH permit has been evaluated to address ongoing facility practices (e.g., Gunderson, Willbridge) and/or the need for end-of-pipe treatment has been determined
- Medium priority basin – Weight of evidence, interim source control measures implemented at sites but long-term monitoring required to evaluate effectiveness and need for any follow-up actions
- Low priority basin – No action (e.g., contaminant concentrations at the outfall are low relative to JSCS and consistent with land use)

## **6) Implementation of Source Control Measures and Long Term Monitoring Plan (LTM)**

Source control for historic releases and associated current migration pathways is implemented, site-specific effectiveness sampling/monitoring ongoing, and outfall basin effectiveness sampling/monitoring ongoing.

Actions needed to clarify requirements/deliverables:

- Identify requirements and format of a long term monitoring plan (could resemble [\*Columbia Slough Watershed Action Plan\*](#); or, could be part of an administrative modification to the 1200z or MS4 permits
- Consider calibrating LTMP requirements with priority of basin (ie, lower priority basins could have less rigorous requirements than high priority basins);
- Identify role of a permit, DEQ and BES permit programs, and DEQ CU program, in meeting objectives of LTM

## **7) No Further Action Determinations**

- Only site-specific in the near term (i.e. to individual RPs)
- Outfall NFAs, if applicable, only after PH ROD is signed and applicable source control measures are proven to be effective, and SCDs reviewed by EPA. An NFA may consist of both a determination that interim actions are complete, and be coupled with a longer term administrative framework (permit based) to deal with perpetual discharges (mainly non-legacy)